



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

**1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733**

June 20, 2016

U.S. Army Corps of Engineers
New Orleans District
Attn: William P. Klein, Jr.
CEMVN-PDN-CEP
P.O. Box 60267
New Orleans, LA 70160-0267

Mr. Klein,

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the United States Army Corps of Engineers (USACE) Integrated Final Feasibility Report and Environmental Impact Statement (Final EIS) for Southwest Coastal Louisiana. The purpose of the proposed action is to provide non-structural hurricane and storm surge risk reduction measures, as well as, ecosystem restoration features in southwest Louisiana.

EPA's review of the Draft Environmental Impact Statement (Draft EIS) identified potential adverse impacts. For these reasons we rated the Draft EIS as "environmental concerns – requests additional information" (EC-1). The EPA's Rating System Criteria can be found here: <http://www.epa.gov/oecaerth/nepa/comments/ratings.html>. In regard to the Final EIS, EPA continues to have concerns for shoreline erosion. We have enclosed detailed comments which clarify our concerns.

If you have any questions or concerns, I can be reached at 214-665-8565, or contact Keith Hayden of my staff at hayden.keith@epa.gov or 214-665-2133.

Sincerely,

A handwritten signature in black ink, which appears to read "Robert Houston", is positioned above the typed name.

Robert Houston
Chief, Special Projects Section

Enclosure

**DETAILED COMMENTS ON THE
U.S. ARMY CORPS OF ENGINEERS
FINAL ENVIRONMENTAL IMPACT STATEMENT
FOR SOUTHWEST COASTAL LOUISIANA**

BACKGROUND: Southwest Coastal Louisiana (SWCL) communities are at increasing risk to storm surge flooding due to wetland loss, relative sea level rise, and land subsidence. The SWCL project proposed by the U.S. Army Corps of Engineers, Mississippi Valley Division, New Orleans District, will provide nonstructural hurricane and storm surge damage risk reduction measures as well as ecosystem restoration features in the 4,700 square mile study area located in Calcasieu, Cameron, and Vermilion Parishes in southwest Louisiana.

Proposed measures of the National Economic Development (NED) nonstructural plan include residential structure elevation, flood proofing, and the acquisition of qualifying structures to reduce potential damages from future tropical storms and hurricanes. The National Ecosystem Restoration (NER) plan includes nine marsh restoration measures which would restore 9,424 acres and nourish 3,181 acres; A hydrologic and salinity control measure to create a 267 average annual habitat unit (AAHU) benefit; five shoreline protection measures that span 252,000 linear feet, and a Chenier reforestation program that includes invasive species control and planting seedling trees on 1,400 acres in multiple locations in Cameron and Vermilion Parishes.

4.0 TENTATIVELY SELECTED PLAN (TSP)

4.2.1 Description of the NER TSP

EPA made the following comment for the Draft EIS:

“The ecosystem restoration component of the Southwest Coastal Louisiana plan includes shoreline erosion reduction measures. The use of rocks and other hard materials for shoreline erosion reduction can provide targeted environmental benefits for important landscape features. Such measures can also have unintended adverse effects due to alteration of sedimentation patterns (which, for example, can increase erosion in unprotected areas) and reduced fish access. Subsequent project-specific NEPA documentation for shoreline erosion projects should assess such potential unintended adverse impacts and include mitigation measures as appropriate. This could possibly include the use of alternative “soft” approaches to shoreline erosion reduction and “fish dips” to allow for greater ingress and egress of aquatic organisms.”

While more information on fish dips in breakwater structures was included in the Final EIS, it was not clear how indirect effects on sedimentation patterns were determined to be “not significant”. A study related to Holly Beach sedimentation and breakwaters is referenced, but very minimal detail is provided concerning the analysis of longshore transport and sedimentation at this or other breakwater locations. It is not clear that any modeling or analysis was done to support the conclusion that indirect effects on sedimentation patterns were not significant.